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**ATTORNEY FOR PLAINTIFF**  
**UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF MONTANA**  
**BILLINGS DIVISION**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**vs.**

**PETER RAYMOND OLIN,**

**Defendant.**

**CR 17-123-BLG-SPW**

**OFFER OF PROOF**

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The defendant, Peter Raymond Olin, is charged by indictment with conspiracy to distribute and to possess with intent to distribute methamphetamine, in violation of 21 U.S.C. § 846 – count I; and possession with intent to distribute methamphetamine, in violation of 21 U.S.C. § 841(a)(1) – count II.

## PLEA AGREEMENT

Olin will plead guilty to count I of the indictment. The United States presented only this plea offers to Olin in writing. The plea agreement entered into by the parties and filed with the Court represents, in the government's view, is the most favorable resolution for Olin. *See Missouri v. Frye*, 566 U.S. 134, 145-46 (2012).

## ELEMENTS OF CHARGE

In order for Olin to be found guilty of conspiracy to possess with intent to distribute and distribute methamphetamine, as charged in count I of the indictment, the United States must prove each of the following elements beyond a reasonable doubt:

**First**, during the time period specified in the indictment, there was an agreement between two or more persons to commit at least one crime as charged in the indictment; and

**Second**, the defendant became a member of the conspiracy knowing of at least one of its objects and intending to help accomplish it.

Although not an element, the United States would also have to prove beyond a reasonable doubt that the conspiracy contemplated the distribution of 500 or more grams of a substance containing a detectable amount of methamphetamine, and that amount:

- (1) fell within the scope of defendant's agreement with the coconspirators, or
- (2) was reasonably foreseeable to the defendant.

### **PENALTY**

This offense carries a maximum punishment of ten years to life imprisonment, a \$10,000,000 fine, at least five years of supervised release, and a \$100 special assessment.

### **ANTICIPATED EVIDENCE**

If this case were tried in United States District Court, the United States would prove the following:

Later in the fall of 2014, after receiving information from a local motel of suspicious activity, the Billings drug task force applied for a search warrant, searched a motel room, and seized approximately 50 grams of methamphetamine, paraphernalia, and indicia of sales such as drug ledgers and multiple cell phones. An Arizona woman was staying in the room and was interviewed. She identified Olin as a local distributor for her and her organization, and she admitted that she had delivered three pounds of methamphetamine to Olin. The woman was charged and convicted of criminal distribution of methamphetamine in Yellowstone County.

Olin remained an individual of interest to the Billings drug task force throughout 2015 and 2016. Individuals that were either sources of information or cooperating defendants throughout that time-period continued to identify Olin as a distributor of methamphetamine in Billings, including individuals that were charged federally and then debriefed after pleading guilty. Three of those individuals admitted to receiving methamphetamine from Olin. D. B. received four ounces on three separate occasions; J.W. received two ounces; and B.B. received gram quantities.

On July 3, 2017, the Billings drug task force interviewed an individual in federal custody in Utah. The individual was caught by local Utah police with a large amount of methamphetamine and arrested in March 2017. The individual Billings drug task force agents interviewed him after his arrest. The individual had personal knowledge of Olin receiving thirty pounds of methamphetamine and identified Olin's source of supply.

DATED this 24th day of May, 2018.

KURT G. ALME  
United States Attorney

/s/ Lori Harper Suek  
LORI HARPER SUEK  
Assistant U.S. Attorney